## DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

SEP 24 4 34 PM 97
POSTAL HATE CAN ACCOUNT OFFICE OF THE SECURITARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

THE DIRECT MARKETING ASSOCIATION, INC.'S FOLLOW-UP INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO USPS WITNESS DANIEL (DMA/USPS-T29-2)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached follow-up interrogatory and request for production of documents to USPS witness Daniel (DMA/USPS-T29-2). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

Dana T. Ackerly II, Esq.

David L. Meyer

Michael D. Bergman COVINGTON & BURLING

1201 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

(202) 662-5296

Counsel for the Direct Marketing Association, Inc.

September 24, 1997

## Witness Daniel (USPS-T-29)

DMA/USPS-T29-2. Please refer to your response to DMA/USPS-T29-1.

- a. What percentage of Standard A parcels is sorted at BMCs?
- b. What percentage of Standard A machinable parcels is sorted at BMCs?
- c. What percentage of Standard A prebarcoded parcels is sorted at BMCs?
- d. What percentage of Standard B parcels is sorted at BMCs?
- e. What percentage of Standard B machinable parcels is sorted at BMCs?
- f. What percentage of Standard B prebarcoded parcels is sorted at BMCs?
- g. What percentage of Standard A machinable parcels is sorted on PSMs retrofitted with a PBCS?
- h. What percentage of Standard A prebarcoded parcels is sorted on PSMs retrofitted with a PBCS?
- i. What percentage of Standard B machinable parcels is sorted on PSMs retrofitted with a PBCS?
- j. What percentage of Standard B prebarcoded parcels is sorted on PSMs retrofitted with a PBCS?

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.

Michael B. Bergman

September 24, 1997